

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                            |   |                                |
|----------------------------|---|--------------------------------|
| <b>SHEILA CARSON,</b>      | ) |                                |
|                            | ) |                                |
| <b>Plaintiff,</b>          | ) | <b>Case No. 08 C 50</b>        |
|                            | ) |                                |
| <b>v.</b>                  | ) | <b>Judge Grady</b>             |
|                            | ) |                                |
| <b>P.O. JOHN DOES 1-2,</b> | ) | <b>Magistrate Judge Ashman</b> |
|                            | ) |                                |
| <b>Defendants.</b>         | ) | <b>Jury Demand</b>             |
|                            | ) |                                |

**PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO IDENTIFY AND SERVE  
CURRENTLY UNNAMED DEFENDANTS**

NOW COMES the Plaintiff, SHEILA CARSON, by and through her attorneys, GREGORY E. KULIS & ASSOCIATES, and in support of her motion for additional time to identify and serve defendants, P.O. JOHN DOES 1-2, states as follows:

**COUNT I – FALSE ARREST**

1. This action was initially filed with the Court on January 3, 2008 and asserts one count of false arrest under 42 U.S.C. §1983 and §1988 and one state law claim of malicious prosecution.

2. It is alleged by Plaintiff that Plaintiff was falsely arrested due to an arrest warrant procured by P.O. JOHN DOES 1-2 providing false information.

3. In an attempt to ascertain the identities of JOHN DOES 1-2, on January 3, 2008, Plaintiff subpoenaed records relating to Plaintiff's arrest from the Chicago Police Department.

4. The paperwork provided in response to the subpoena was unhelpful in determining the identities of the individuals who were responsible for obtaining the arrest warrant.

5. Multiple communications with City of Chicago Department of Law representative David Seery whereby Plaintiff attempted to obtain paperwork that would supply the appropriate identifying information proved unsuccessful.

6. Plaintiff subsequently sent another subpoena to the Chicago Police Department on January 28, 2008, again the response to which proved unhelpful.

7. Plaintiff also contacted the Office of the Cook County Public Defender in an attempt to obtain documents, including the arrest warrant, from Plaintiff's criminal case file.

8. On April 1, 2008, Plaintiff sent a subpoena to the Chicago Police Department specifically requesting all arrest warrants for Plaintiff, SHEILA CARSON.

9. On April 8, 2008, Plaintiff was contacted by Paul Fields of the Office of the Cook County Public Defender and informed that it may take up to three weeks to obtain the documents.

10. As Rule 4(m) of the Federal Rules of Civil Procedure requires that a defendant be served within 120 days of the filing of the complaint, though the time may be extended by the Court upon a showing by the plaintiff that good cause existed for his failure to do so.

WHEREFORE the Plaintiff, SHEILA CARSON, whose diligent efforts to identify JOHN DOES 1-2 have failed through no fault of her own, now asks this Court grant her an additional 60 days to identify and serve Defendants as and for any other relief the Court deems just and necessary.

Respectfully submitted,

/s/ Ronak Patel

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